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Colin Barceloux

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

COLIN BARCELOUX, a California Citizen,

Plaintiff,

vs.

THE LIGHT GROUP, LLC, a Nevada
Corporation; LIBBEY GLASS, INC.; and
DOES 1-100, ROE Corporations I-X,
inclusive,

Defendants.

CASE NO: 2:15-cv-02448-JAD-NJK

**STIPULATION AND ORDER TO HOLD
EXPERT DEADLINES IN ABEYANCE**

SECOND REQUEST

(Under Scheduling Order entered January 6,
2017, Dkt. # 76)

IT IS HEREBY STIPULATED, by and between:

Plaintiff: COLIN BARCELOUX, through his counsel of record, Ryan Hamilton. Esq. of
HAMILTON LAW, and

Defendant: LIBBEY GLASS, INC., through its counsel of record, Brian K. Terry, Esq. of
THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER,

1. Discovery Completed to Date:

- A. Parties have propounded lengthy written discovery and parties have answered;
- B. The parties have disclosed numerous records and evidence;
- C. Deposition of Plaintiff (by Defendant The Light Group, LLC);
- D. Parties have briefed a summary judgment motion;

2. Discovery that Remains to be Completed

- A. Depositions of the Defendant's representatives;
- B. Discovery of third-party distributor;
- C. Deposition of third-party witnesses;
- D. Disclosure of experts;
- E. Depositions of the parties' experts (to be disclosed);
- F. Additional written and deposition discovery as determined by the parties;

3. Why Discovery Was Not Completed Within the Limits Set by the Discovery Order

Plaintiff has moved to join third-party glassware distributor A&H Supply, Inc. as a defendant. Defendant Libbey Glass, Inc. has opposed Plaintiff's motion. The Court has set hearing on the motion for June 5, 2017. If the Court grants Plaintiff's motion it is likely that a new scheduling order will need to be entered in the case. The parties seek to hold the expert disclosure deadlines in abeyance until the Court has ruled on Plaintiff's motion.

4. Proposed Schedule for Completing Discovery

The current deadlines are as follows:

Last day to serve initial disclosures	Closed
Last day to file a motion to add parties Or amend pleadings	Closed
Initial expert disclosure deadline:	May 29, 2017
Interim Status Report	May 29, 2017
Rebuttal expert disclosure deadline:	June 28, 2017
Discovery cut off:	July 28, 2017
Last day to file dispositive motions	August 28, 2017
Joint Pretrial Order	September 28, 2017

The proposed schedule for completing the remaining discovery is as follows:

Last day to serve initial disclosures	Closed
Last day to file a motion to add parties Or amend pleadings	Closed
Initial expert disclosure deadline:	abeyance
Interim Status Report	May 29, 2017
Rebuttal expert disclosure deadline:	abeyance
Discovery cut off:	July 28, 2017
Last day to file dispositive motions	August 28, 2017
Joint Pretrial Order	September 28, 2017

5. Certificate of Conference and Stipulation

Counsel for the parties have conferred by email and telephone and have signed below, indicating their agreement to this Stipulation and Order to Hold the Expert Deadlines in Abeyance (Second Request).

The parties do not request a conference with the Magistrate before entry of an Amended Scheduling Order, should one be required.

DATED this 8th day of May, 2017.

By: /s/Ryan A. Hamilton
HAMILTON LAW
5125 S. Durango, Suite C
Las Vegas, NV 89113

By: /s/Brian K. Terry
Brian K. Terry, Esq.
THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER
1100 E. Bridger Avenue
Las Vegas, NV 89101-5315

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The stipulation is **GRANTED** in part and **DENIED** in part,
and the deadlines are set as follows:

Last day to serve initial disclosures	Closed
Last day to file a motion to add parties Or amend pleadings	Closed
Initial expert disclosure deadline:	abeyance June 19, 2017
Interim Status Report	May 29, 2017
Rebuttal expert disclosure deadline:	abeyance July 7, 2017
Discovery cut off:	July 28, 2017
Last day to file dispositive motions	August 28, 2017
Joint Pretrial Order	September 28, 2017

DATED May 9, 2017.



United States Magistrate Judge